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Attorneys for Plaintiffs
DEMETRIC DI-AZ and OWEN DIAZ

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

DEMETRIC DI-AZ, OWEN DIAZ, and
LAMAR PATTERSON,

Plaintiffs,

v.

TESLA, INC. dba TESLA MOTORS, INC.;
CITISTAFF SOLUTIONS, INC.; WEST
VALLEY STAFFING GROUP;
CHARTWELL STAFFING SERVICES, INC.;
and DOES 1-50, inclusive,

Defendants.

Case No. 3:17-cv-06748-WHO

**DECLARATION OF CIMONE A.
NUNLEY IN SUPPORT OF
PLAINTIFFS' MOTION FOR
SANCTIONS**

Date: February 19, 2020

Time: 2:00 p.m.

Courtroom: 2, 17th Floor

Judge: Hon. William H. Orrick

Trial Date: May 11, 2020

Complaint filed: October 16, 2017

1 I, CIMONE A. NUNLEY, hereby declare:

2 1. I am an attorney licensed to practice law in the State of California. I am an
3 attorney with the law firm of California Civil Rights Law Group, attorneys of record for
4 Plaintiffs Demetric Di-Az and Owen Diaz in this action. I submit this Declaration in support of
5 Plaintiffs' Motion for Sanctions. I have personal knowledge of the facts stated herein and if
6 called upon to testify, I could and would competently testify thereto, except as to those matters
7 that are stated upon information and belief.
8

9 2. I was admitted to the State Bar of California in September of 2019. My current
10 hourly rate is \$350. I spent approximately 21.2 hours preparing and filing this motion, resulting
11 in attorney's fees of \$7,240. Upon request, I will provide billing records to the Court.
12

13 3. Attached hereto as Exhibit 1 is a true and correct copy of Plaintiff Owen Diaz's
14 Interrogatories to Defendant Tesla, Inc.—Set Two, propounded in this action.

15 4. Attached hereto as Exhibit 2 is a true and correct copy of Defendant Tesla, Inc.'s
16 Response to Plaintiff Owen Diaz's Interrogatories—Set Two, produced in this action.
17

18 5. Attached hereto as Exhibit 3 is a true and correct copy of a letter Plaintiffs mailed
19 to Defendant Tesla, Inc. on May 4, 2019 regarding Tesla's discovery responses.

20 6. Attached hereto as Exhibit 4 is a true and correct copy of Defendant Tesla, Inc.
21 dba Tesla Motors, Inc.'s Initial Discover Information Pursuant to General Order No. 71,
22 produced in this action.
23

24 7. Attached hereto as Exhibit 5 is a true and correct copy of excerpts from Defendant
25 Tesla, Inc. dba Tesla Motors, Inc.'s Response to Plaintiff Owen Diaz's Interrogatories, Set
26 Three, produced in this action.

27 8. Attached hereto as Exhibit 6 is a true and correct copy of excerpts from Defendant
28 Tesla, Inc.'s Response to Plaintiff Owen Diaz' Interrogatories—Set One, produced in this action.

1 I declare under penalty of perjury under the laws of the United States of America that the
2 foregoing is true and correct. Executed on January 10, 2020 in San Anselmo, California.
3

4
5 DATED: January 10, 2020

By: 

Lawrence A. Organ, Esq.

Navruz Avloni, Esq.

J. Bernard Alexander, Esq.

Cimone A. Nunley, Esq.

Attorneys for Plaintiffs

DEMETRIC DI-AZ AND OWEN DIAZ
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